

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO: 0:22-CV-61553-WPD

CRUZ VALDIVIESO FIGUERA,

Plaintiff,

vs.

**ALL VIP CARE, INC., &
LIZ VELAZQUEZ McKINNON,**

Defendants.

MOTION TO WITHDRAW

The undersigned attorney, Randy M. Goldberg, Esquire, and the Florida Healthcare Law Firm (collectively the "FHLF") in accordance with Rule 4-1.16 of the R. Regul. FL. Bar, et al, files this Motion to Withdraw from further representation of the Defendants **ALL VIP CARE, INC., & LIZ VELAZQUEZ McKINNON**, as the Defendants have terminated the relationship between the Plaintiff and the FHLF effective immediately.

The Defendants' current mailing address collectively is c/o **LIZ VELAZQUEZ McKINNON**, individually and on behalf of **ALL VIP CARE, INC.** 5601 Corporate Way, Ste 204, W. Palm Beach, FL 33407, with an email address of liz@allvipcare.com.

WHEREFORE FHLF respectfully requests that this Court enter an Order: (i) granting FHLF's Motion to Withdraw; (ii) together with whatever further relief that this Court deems fit and proper.

VERIFICATION & CONSENT

I, **LIZ VELAZQUEZ McKINNON**, verify that the foregoing representations are true and correct to the best of my ability and knowledge and I request to terminate FHLF's further representation of the Defendants in this action.

By: 

LIZ VELAZQUEZ McKINNON, individually and
as President of **ALL VIP CARE, INC.**

Dated: 11/6/2023

CERTIFICATIONS

I hereby certify that a copy of this pleading which was filed with the Clerk of the Court and was provided to: **Brian Howard Pollock, Esquire**, Fairlaw Firm, 135 San Lorenzo, Avenue, Suite 770, Coral Gables, FL 33146, Brian@fairlawattorney.com; and all attorneys listed on and via the ECM System on **November 6, 2023**.

/s/ RANDY M. GOLDBERG, ESQUIRE

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